

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

---

IN RE: DEALER MANAGEMENT SYSTEMS  
ANTITRUST LITIGATION

MDL No. 2817  
Case No. 18 C 864

This Document Relates to:  
*Authenticom, Inc. v. CDK Global, LLC, et al.*,  
Case No. 1:18-cv-00868 (N.D. Ill.)

Hon. Robert M. Dow, Jr.

---

**AUTHENTICOM, INC.’S MOTION TO SEAL ITS  
MEMORANDUM AND ACCOMPANYING EXHIBITS IN SUPPORT OF  
ITS MOTION TO DISMISS THE COUNTERCLAIMS OF CDK GLOBAL, LLC**

---

Plaintiff and Counterclaim-Defendant Authenticom, Inc. (“Authenticom”) respectfully requests leave to file under seal its Memorandum in Support of its Motion to Dismiss Defendant CDK Global, LLC’s Counterclaims (“Memorandum”) and accompanying exhibits. The Memorandum and Exhibits A-D include information from documents that CDK has designated as “Confidential” or “Highly Confidential,” and Authenticom therefore seeks leave to file them under seal. Authenticom will also file a public, redacted version of the Memorandum.

Authenticom files this motion without prejudice to its ability challenge CDK’s improper use of the Confidential and Highly Confidential designations for documents that are not proprietary and do not contain trade secrets.

Dated: July 20, 2018

Respectfully submitted,

Jennifer L. Gregor  
Kendall W. Harrison  
**Godfrey & Kahn S.C.**  
One East Main Street, Suite 500  
Madison, WI 53703  
(608) 257-0609  
jgregor@gklaw.com  
kharrison@gklaw.com

*Attorneys for Authenticom, Inc.*

/s/ Derek T. Ho  
Derek T. Ho  
Michael N. Nemelka  
Aaron M. Panner  
David L. Schwarz  
Kevin J. Miller  
Daniel V. Dorris  
Joanna T. Zhang  
Joshua Hafenbrack  
**Kellogg, Hansen, Todd,  
Figel & Frederick, P.L.L.C.**  
1615 M Street, NW, Suite 400  
Washington, D.C. 20036  
(202) 326-7900  
dho@kellogghansen.com  
mnemelka@kellogghansen.com  
apanner@kellogghansen.com  
dschwarz@kellogghansen.com  
kmiller@kellogghansen.com  
ddorris@kellogghansen.com  
jzhang@kellogghansen.com  
jhafenbrack@kellogghansen.com

*Attorneys for Authenticom, Inc.*

**CERTIFICATE OF SERVICE**

I, Derek T. Ho, an attorney, hereby certify that on July 20, 2018, I caused a true and correct copy of the foregoing **AUTHENTICOM INC.'S MOTION TO SEAL ITS MEMORANDUM AND ACCOMPANYING EXHIBITS IN SUPPORT OF ITS MOTION TO DISMISS THE COUNTERCLAIMS OF CDK GLOBAL, LLC** to be filed and served electronically via the court's CM/ECF system. Notice of this filing will be sent by email to all parties by operation of the court's electronic filing system or by email to anyone unable to accept electronic filing as indicated on the Notice of Electronic Filing. Parties may access this filing through the court's CM/ECF System.

/s/ Derek T. Ho

Derek T. Ho

**KELLOGG, HANSEN, TODD,**

**FIGEL & FREDERICK, P.L.L.C.**

1615 M Street, NW, Suite 400

Washington, D.C. 20036

(202) 326-7900

dho@kellogghansen.com